

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

LINDY G. WRIGHT,

Plaintiff,

V.

**CHATTAHOOCHEE VALLEY
COMMUNITY COLLEGE (CVCC),
et al.,**

Defendants.

Civil Action No. 3:06-CV-1087-WKW

SUBMISSION REGARDING DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO FILE RULE 26 PROPOSED DISCOVERY PLAN

COME NOW the Defendants, by and through counsel, H. E. Nix, Jr., and represent to the Court that undersigned counsel has conferred with counsel for the Plaintiff in this matter, Jennifer B. Cooley, and that an agreement has been reached between the parties regarding the Defendants' Motion for Extension of Time. Undersigned counsel represents to the Court as follows:

1. The Plaintiff and the Defendants, by way of a telephone conference between Jennifer B. Cooley and H. E. Nix, Jr., have agreed that this Submission may be filed with the Court and that undersigned counsel may make the representations contained herein.
2. The parties are in agreement that additional time would be helpful and beneficial for the purpose of discussing a new and different Proposed Discovery Plan.
3. The parties request that the Court allow them, through counsel, to meet and discuss a different Proposed Discovery Plan which would be filed no later than Friday, January 26.

WHEREFORE, the parties respectfully request that the Court issue an Order

allowing the parties to develop a different Proposed Discovery Plan from the Proposed Discovery Plan previously filed on January 16, 2007 and that the Court require the submission of this Proposed Discovery Plan by no later than January 26, 2007.

Respectfully submitted,

/s/ H.E. Nix, Jr.
H.E.Nix, Jr. (NIX007)

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that an exact copy of the foregoing instrument has been served on the following individual(s) by email from the Court or by placing a copy of same in the United States Mail, postage prepaid and properly addressed on this 18th day of January, 2007.

Jennifer B. Cooley
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Peter A. Dumbuya
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/s/ H.E. Nix, Jr.
OF COUNSEL